

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS

V.

CA. NO. 04-1350 (GMS)

DR. SYLVIA FOSTER, ET AL

MOTION FOR 20 DEPOSITION ANSWERS
1A FOR DEFENDANT DAVID MOFFETT
PURSUANT TO FED R. CIV P# 30 (A)(2)
IN ACCORDANCE TO THE HONORABLE JUDGE
GREGORY M. SLEET'S FEB 21, 07 ~~ORDER~~.
MEMORANDUM P. 8

DATE: 3/12/07



Jimmie Lewis
SBI # 506622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DEL 19977

- 1.) DAVID MOFFETT WHAT IS YOUR SPECIFIC ACCOUNT OF WHAT OCCURED AT THE D.P.C MITCHELL BUILDINGS DINNING HALL ON 6/14/04 AT OR ABOUT 8:00 PM, REGARDING THE PLAINTIFF JIMMIE LEWIS.
- 2.) DAVID MOFFETT WHO WERE THE D.P.C PERSONEL THAT ESCORTED TIT PLAINTEFF TO THE SECLUSION ROOM ON 6/14/04 AT OR ABOUT 8:00 PM.
- 3.) DAVID MOFFETT WHAT IS THE DISCRPTION OF YOUR JOB DUTIES
- 4.) DAVID MOFFETT HAVE YOU EVER HAVE TO UTILIZE FORCE ON A PATIENT AT THE D.P.C

5.) DAVID MOFFETT WHILE DR. FOSTER
WAS EMPLOYED AT THE D.P.C
DATING 5/21/04 TO 6/25/04
DID SHE HAVE THE AUTHORITY
TO ORDER YOU TO UTILIZE FORCE
ON A PATIENT

6.) DAVID MOFFETT HAVE YOU
EVER FILED GRIEVANCE(S)
REGARDING THE DESCRIPTION
OF YOUR JOB DUTIES AT THE D.P.C

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS
DUE HEREBY CERTIFY ON THIS 12TH, DAY OF MARCH,
2007, THAT I DID MAIL ONE TRUE AND CORRECT
COPY OF THE MOTION FOR 20 DEPOSITION ANSWERS
1A FOR DEFENDANT DAVID MOFFETT PURSUANT
TO FED R. CIV P # 30 (A)(2) IN ACCORDANCE TO
THE HONORABLE JUDGE GREGORY M. SLEET'S FEB 21, 07
ORDER,, BY U.S. POSTAL TO THE FOLLOWING :

CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST, LOCKBOX 18
WILMINGTON, DELAWARE 19801

GREGORY E. SMITH
DEPUTY ATTORNEY GENERAL
820 N. FRENCH ST, 7TH FL
WILMINGTON, DELAWARE 19801

DATE : 3/12/07

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